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February 26, 2020

The Honorable Sam A. Lindsay
Judge, United States District Court
1100 Commerce Street, Room 1544
Dallas, TX 75242-1003

via ECF Filing and Service

Re: Civil Action No. 3:15-CV-04108-D, *Samsung Electronics America, Inc. v. Chung, et al.*

Dear Judge Lindsay:

Related to the Fourth Amended Complaint (Doc. 444) filed in this case on 02/13/2020, I write to clarify the dismissed status of Defendant Jin-Young Song whom I represent in this case. Although in its opening paragraph, Plaintiff's Fourth Amended Complaint purports to identify Mr. Song as a defendant facing claims and one of the defined "Employee Defendants" against whom claims are raised--specifically, Counts 3 and 4--all claims and causes of action against Mr. Song were dismissed with prejudice in the Court's Order dated 12/13/2018 (Doc. 332). I have spoken about this with Benjamin Riemer, counsel for Plaintiff, who confirmed to me that Samsung does not seek to reassert or "revive" any claims or causes of action against Mr. Song.

I call this to the Court's attention just so there can be no misunderstanding that although Plaintiff's Fourth Amended Complaint mentions Mr. Song, apparently mistakenly, all claims against him remain dismissed.

Very truly yours,



V. Elizabeth Kellow

cc: All Counsel of Record by e-service